

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**KATIE MILILLO, IRENE JOHNSON,
JANINE HELLER and TOMAYITA
STEVENSON,**

Plaintiffs,

vs.

**WHITMAN EDUCATION GROUP,
INC., CAREER EDUCATION
CORPORATION, ULTRASOUND
DIAGNOSTIC SCHOOL and LOUIS
GIANELLI,**

Defendants.

CASE NUMBER: 04-30130-MAP

**DEFENDANTS' MOTION FOR LEAVE TO FILE REPLY TO PLAINTIFFS'
OPPOSITION TO DEFENDANTS' JOINT MOTION TO COMPEL DISCOVERY**

Defendants Whitman Education Group, Inc., Career Education Corporation, Ultrasound Diagnostic School, and Louis Giannelli, by and through their respective attorneys, hereby move the Court pursuant to Local Rule 7.1(B)(3) to file a reply brief to Plaintiffs' Opposition To Defendants' Motion To Compel Discovery ("Opposition") filed on September 13, 2005 (see Dkt. #31). As grounds for this Motion Defendants state as follows: Plaintiffs have raised new legal issues in their Opposition, the response to which will assist the Court in deciding the motion at issue, and Defendants believe that a reply will otherwise assist the Court in deciding Defendants' Motion to Compel. Defendants intend to file their reply no later than Friday, September 23, 2005.

Wherefore, Defendants request that their Motion For Leave to File a Reply be allowed.

Respectfully submitted,

Dated: September 16, 2005.

/s/ Jeffrey E. Poindexter

Jeffrey E. Poindexter
BBO# 631922
Bulkley, Richardson and Gelinas, LLP
1500 Main Street, Suite 2700
Springfield, Massachusetts 01115
Tel. (413) 272-6232
Fax. (413) 272-6803

Edward S. Mazurek, Esquire
admitted pro hac vice
Jamie M. Kohen, Esquire
admitted pro hac vice
MORGAN, LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
Tel. (215) 963-5019/5472
Fax. (215) 963-5001

Attorneys for Defendants
WHITMAN EDUCATION GROUP,
INC., CAREER EDUCATION
CORPORATION, and ULTRASOUND
DIAGNOSTIC SCHOOL

Christopher O'Hara, Esq.
Tricia Rice, Esq.
Todd & Weld LLP
28 State Street, 31st Floor
Boston, MA 02109

Attorneys for Louis Giannelli